

**File Code:** 2470**Date:** June 16, 2017**Route To:****Subject:** Request to Exceed 40-acre Regeneration Harvest Limit on Windy Shingle Project**To:** Leanne Marten, Regional Forester

The proposed action for the Windy Shingle project would create forest openings larger than 40 acres in size through the use of even-aged regeneration methods. In accordance with direction provided in the Region 1 supplement to FSM 2471.1, I am requesting Regional Forester approval to exceed the 40 acre size limit. The Windy Shingle project proposal can be found on the Nez-Perce Clearwater project website: <https://www.fs.usda.gov/project/?project=50250>. Specialist reports are currently available on the O drive:

O:\NFS\NezPerceClearwater\Project\SalmonSubBasin\Planning\WindyShingleCE2016. These will be posted to the project website with the Decision Memo when it is signed.

The 26,000 acre Windy Shingle project area is located on the lower slopes of the Seven Devils Mountains in the Little Salmon River drainage southwest of Riggins, Idaho. Forests health in the area has been in continuous decline with widespread root disease, bark beetle and mistletoe-induced mortality and decay (Forest Vegetation Report, pp.1-2 and 5-6; Forest Health Protection (FHP) Trip Report, pp. 2-14). The project area is located in the wildland-urban interface (WUI) and borders increasingly "settled" and subdivided private lands containing hundreds of structures, numerous utility corridors, a multitude of public access roads and widespread range improvements.

The purpose and need of the Windy Shingle project is to:

- Reduce the risk or extent of, or increase resilience to, insect or disease infestations in the project area by improving resiliency of stand structure, function and composition;
- Reduce wildfire risk to the local communities and surrounding federal lands.

To achieve these objectives it is necessary to create openings larger than 40 acres in size. Relatively large openings are specifically needed to:

- Appropriately address the scale of declining forest health and insects and disease affecting the area.
- Trend the landscape pattern of stand structures and patch sizes towards a configuration falling within the historic range of variability (Vegetation Report, pp. 5 and 12-13).



- Promote species diversity and a mosaic of age and size classes across the landscape and reduce the acreage of Douglas-fir and lodgepole pine that is at increasing hazard to bark beetle attack (Forest Health Protection Report p. 15; Vegetation Report, pp. 5, 9 and 18).
- Create relatively large areas with fuels conditions that are less prone to extreme fire behavior. These areas will contribute to a pattern of fuel treatments that is effective in modifying potential fire behavior at the landscape scale, reducing spread rates across the landscape, and producing a safer environment in which to conduct fire control activities (Fire and Fuels Report, p. 9).

Successful fire suppression (Fire and Fuels Report p. 9) in combination with past harvest practices (Vegetation Report pp. 4-5) has caused the pattern of stand structures and patch sizes in the Windy Shingle project area to move towards the edges of the historic range of variability for these attributes (Vegetation Report, pp. 5). Large patches of early seral vegetation and open structures are currently underrepresented at the scale of the Windy Shingle project area (Vegetation Report, p. 5). In the continued absence of variable scale and severity fire, the creation of large openings and the restoration of open stand structures and associated early seral vegetation is essential to restoring a desirable pattern and distribution of forest structures in the project area (Vegetation Report, pp. 5, 12-13 and 21).

Large portions of the Windy Shingle project area are occupied by increasingly homogenous and dense, shade tolerant stands. These stands are at increased hazard to insect and diseases they age, increase in density and their composition shifts towards more shade tolerant species (Forest Vegetation Report, pp.1-2 and 5-6; FHP Trip Report, pp. 2-14). The promotion of species diversity and the creation of a mosaic of age and size classes across the landscape was recommended by a Forest Health Protection site visit (FHP Report, p. 19) to reduce insect and disease hazard and to avoid a scenario where widespread mortality continues to act to increase wildland fuel loading. Given the large, contiguous portions of the project area occupied by Douglas-fir, grand fir and lodgepole pine (Forest Vegetation Report, pp.17-18) regeneration openings larger than 40 acres are needed to effectively implement this hazard reduction strategy. Limiting treatments to smaller, discontinuous areas would not be nearly as effective at addressing insect and disease hazard as large, contiguous areas of high hazard trees would remain (Forest Vegetation Report, pp.17-18).


The majority of the Windy Shingle Project area falls within the WUI of Idaho County (Scoping Letter/Proposed Action, p. 2). There is a need to reduce the continuity of hazardous fuels conditions, and to produce changes in fire behavior that would lower the rate of spread and flame lengths to protect firefighters, resource values and private land in this area (Scoping, pp. 1-2; Fire and Fuels Report, pp. 6-7 and 11). Research supports that the spatial arrangement, size, and amount of the landscape treated strongly affect how fast and intensely a wildfire can burn through a forest (Fire and Fuels Report p. 9). Treatments other than regeneration harvest (i.e. thinning) were considered to modify fuel conditions in the areas where regeneration openings larger than 40 acres are proposed (Vegetation Report p. 10). However, given current vegetation conditions in these areas (Vegetation Report pp. 11-12 and 14), the need to achieve vegetation management objectives related to composition, structure, patch size and resiliency, and the desire to provide lasting changes to hazardous fuels conditions, treatments other than regeneration harvest can be effectively ruled out as options. In that context, regeneration harvest openings larger than 40 acres have greater potential for reducing fire severity, disrupting

large fire growth and reducing fire movement then smaller openings or intermediate treatments (Fire and Fuels Report, p. 9). These larger treatment areas will also serve as better fuel breaks where suppression resources can engage fires more safely and under more severe conditions than smaller treatment areas (Fire and Fuels Report, pp. 6-7 and 9). Treating smaller and more isolated areas would likely be less effective in reducing severe fire behavior and rate of spread near human developments (Fire and Fuels Report, pp. 14-15). Landscape-level fire spread was modeled using the minimum travel time function of the FlamMap fire behavior program (Fire and Fuels Report, p. 7). The nature, size and arrangement of treatment areas in the proposed action are intended to address the priority areas that were identified in this process and would be effective at reducing fire spread, disrupting large fire growth and reducing fire movement (Fire and Fuels Report, pp. 9 and 15).

The Windy Shingle project was developed by resource specialists working collaboratively with interested residents and stakeholders over the course of several meetings and field trips. Input on the project was also sought from the Clearwater Basin Collaborative and the Nez Perce Tribe. 60-day public notice on regeneration unit proposals exceeding 40 acres began when scoping for the Windy Shingle project was distributed to the public for comment in January of 2017. The size of the proposed even-aged regeneration openings are fully disclosed and analyzed in the specialist reports. Scoping documents and supporting specialist reports are available at: <https://www.fs.usda.gov/project/?project=50250>. Issues and concerns raised during the public comment period specific to openings in excess of 40 acres were considered and addressed with a suite of design features (Vegetation Report, pp. 10-13 and 14-17).

Regeneration harvest units would create eight openings larger than 40 acres in size. The proposed openings that would exceed 40 acres are displayed on the attached maps and listed in Table 1 with unit numbers, stand identification numbers, treatment acreages and harvest prescription types. All units have a completed silvicultural diagnosis and prescriptions will be approved by a certified silviculturist prior to implementation. These prescriptions will include provisions for restocking openings created by regeneration harvest with fire resistant western larch and ponderosa pine.

In summary, I feel that it is necessary to exceed the 40-acre limitation on regeneration harvest openings to meet the objectives of the Windy Shingle project and effectively address forest health and hazardous fuels concerns. This request to exceed 40 acres for selected regeneration openings is not a function of any recent natural catastrophic events. The Decision Memo for the Windy Shingle project is expected to be issued in July of 2017.



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cc: cc: Barry Bollenbacher, Jeff Shinn, Joan Brown, Geoff Kaeberle, Albert Helgenberg